

**EXHIBIT
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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, *et al.*,

Defendants,

and

VALERIE LAVEUS, *et al.*,

Intervenor-Defendants.

Case No. 6:23-cv-00007

**DECLARATION OF JOCELYN WYATT, CEO OF ALIGHT
(pursuant to 28 U.S.C. § 1746)**

I, Jocelyn Wyatt, upon my personal knowledge, hereby declare as follows:

1. I am the Chief Executive Officer for Alight. I assumed this position in December 2021 and previously was the Co-Founder and CEO of IDEO.org for 10 years.
2. Alight is a non-profit organization that has been assisting displaced individuals across the globe for more than 40 years. We provide health care and clean water, shelter, protection, and economic opportunity to more than 4 million

people in 19 countries each year, working with them to co-design solutions that help them build full and fulfilling lives. Our core and fundamental belief is that every human being is full, whole, complex, and worthy of being truly seen. Alight believes that abundance is everywhere, and our work is focused on shining a light on each individual's dignity, humanity, and value. We have over 2,300 staff globally with U.S. teams in Minneapolis, New York, and Washington, D.C. Our executive team is based in Minneapolis, Minnesota; New York City, New York; Nairobi, Kenya; and Kigali, Rwanda.

3. As part of our mission to work with refugees, trafficked persons, and economic migrants, Alight has invested significant resources into building support systems for individuals able to benefit from recently adopted parole programs in the United States. For example, around 75,000 Afghans have arrived in the United States since the summer of 2021 via the *Operation Allies Welcome* parole program. In partnership with the State of Minnesota, Alight stepped forward to set up homes for Afghan families arriving through *Operation Allies Welcome*. We consulted with Minnesota's existing Afghan community and worked in collaboration with other Minnesota service organizations to set up 131 homes stocked with cultural and religious items so that resettled families could feel a sense of stability, protection, dignity, and joy. We also worked to furnish the homes with food, home goods, wi-fi, and other essentials so that each time a family received the keys to a home, they would feel cared for, empowered, and ready to build a new life. Since then, we have worked with recently resettled

Afghan families to co-create community programs to serve their needs, including sewing socials for women to allow them to be in community and to combat feelings of isolation and loneliness; monthly field trips for Afghan women and youth that allow them to connect to the people and places around them and get to know the new area where they are building a life; and community gatherings during the Ramadan season so that resettled families can build ties to others in their new communities.

4. Alight has also invested significantly in infrastructure to support the *Uniting for Ukraine* parole program, created in April 2022, which provides a pathway for Ukrainian citizens and their immediate family members who are outside the United States to come to the United States and stay temporarily in a 2-year period of parole. Under the program, a Ukrainian family must have a sponsor in the United States who agrees to support them financially and help them get on their feet during their stay. Alight has worked to facilitate this sponsorship process and make it as seamless as possible for both sponsors and the parole beneficiaries. For example, in addition to working to match sponsor groups with Ukrainian families seeking to come to the United States, Alight has been providing customized support to these sponsors. We prepare and train them through a digital training program, pre-arrival workshops, and virtual meetups so that they are equipped to provide the necessary support to welcome Ukrainian newcomers and give them the information and tools they need to start a new life here. With our help, sponsors meet the parole beneficiaries at the airport; help

them find permanent housing, along with the furniture and other goods needed to set up a new home; make sure they are connected to a health care provider and enrolled in a health insurance plan; help them apply for jobs; and generally help them get situated in their new communities, with access to public transportation and community resources like English language classes.

5. In addition to assisting individual sponsors, Alight began developing a Job Sponsorship Pathway for paroled individuals in December 2022. Through the program, Alight sponsors individuals and their families, helps them relocate, and connects them with additional resources once they arrive in the U.S. Through our years of experience serving displaced communities, we know that individuals who may become displaced due to circumstances beyond their control nevertheless have skills, talent, and experience in a wide variety of industries and fields. We also know, from partnering with industry leaders here in the United States, that the U.S. has huge labor needs that cannot be met solely by hiring domestic workers. It is a win-win situation to match the talents of paroled individuals with U.S. labor needs.

6. To ensure success for everyone involved, Alight is committed to building up the Job Sponsorship Pathway as holistically and robustly as possible. We consider all industries and professional fields for the Pathway and work with employers to identify specific fields where labor shortages exist. We also consider where those employers are located in the United States and whether there are community-based organizations in those places who are willing to partner with

us and support newcomers when they arrive. Because a positive outcome is more likely if a newcomer is supported upon arrival to the United States, we have intentionally partnered with employers in locations where we have preexisting partnerships with local community-based organizations. Those community-based organizations assist with securing housing and ensuring the newcomer has registered for any applicable programs.

7. We launched the new Job Sponsorship Pathway for Ukrainians eligible for parole under Uniting for Ukraine. This is because we already have an end-to-end pathway established. With staff in Poland and in the United States, we can support Ukrainians through the entire process, from the time they learn about the Job Sponsorship Pathway and start gathering information to decide whether this is an opportunity they want to take advantage of; to the application and interview process with the employer; to their arrival in the United States and throughout their time here. We appreciate that it is a significant and weighty matter for displaced individuals to determine what their options are for the future, and we want to provide support through that decision-making process.

8. Our first step is outreach to potentially eligible individuals in Europe. Alight staff work in community centers in Poland that Ukrainians use, and the staff educate individuals about the Job Sponsorship Pathway. We also use social media and send digital surveys to individuals, which explain the Uniting for Ukraine program, ask some eligibility questions, and request their contact information. Based on social media or survey responses, a Ukrainian-speaking

staff member called a “guide” will contact the individual to explain more about the program and gauge the individual’s interest. The guide will encourage the individual to submit their CV into a talent catalogue, which we manage with our partner Talent Beyond Boundaries, and supports the individual throughout the process of preparing and submitting their CV. Because displaced Ukrainians do not always have access to a reliable internet connection to submit their CV, our guides work with interested individuals to help them enter their information into the online application. We launched the talent pool in January 2023, and there are currently approximately 590 CVs in the system. Our goal is to continue to grow and eventually have thousands in the talent pool.

9. On the U.S. side, we have been building relationships with employers who express interest in hiring individuals via this remote pathway. We learn about the employer’s job openings, salary range, and other relevant information. We then find qualified individuals from our CV pool, anonymize their CVs, and share them with the employer. If the employer has interest in interviewing any of those candidates, we go back to the selected candidates to share information about the job and ask if they are interested in interviewing for the position. We try to give as much information about the employer and job as we can to ensure a good fit between the employer and the desired candidate. If the candidate is interested in the job, we arrange a virtual interview.

10. Once an individual receives a job offer, we share a welcome packet that includes as much information as possible to enable the individual to make an

informed decision their opportunity to move to the United States. It is important for us to build trust with individuals we work with; unfortunately, misinformation, scams, and human trafficking are common, so we work hard to communicate clearly what to expect from Alight. Thus, in addition to providing information about the job, the employer, the city where they would resettle, and other information about basic necessities like housing and transportation, our welcome packets (and our guides) provide information about what displaced individuals should and should not expect from us and from any other resettlement or aid program. (For example, we stress that legitimate aid programs do not require payment for services.)

11. Our goal is for these individuals to be self-sufficient when they come to the United States. Ideally, their wages will allow that, so we talk to employers about how the salary ranges they are willing to offer relate to the cost of living in the areas where they want to hire. In addition, the support and information that we endeavor to provide serves to partially orient individuals to their new city and employer before they even arrive, which allows them to navigate their new communities with more assurance and be able to immediately start contributing to the American economy and their new community.

12. To grow the Job Sponsorship Pathway, we are currently focusing on Boston, Syracuse, western New York, Nebraska, and Minnesota, because those are the places where there are not only interested employers but also where we have strong community ties to local organizations that can provide the

wraparound support that is so critical to ensuring a positive outcome for a paroled individual or family. In those locations, we are in conversations with employers in the health care, childcare, manufacturing, and hospitality industries that have expressed significant labor needs and interest in hiring parole beneficiaries, including those with diverse language abilities. By ensuring the availability of wraparound services, we help set up both employer and employee for success.

13. The Job Sponsorship Pathway model is already showing that it is both sustainable and successful in demonstrating the benefits of the talents of displaced individuals. We began collecting CVs from displaced Ukrainians in January, and the first job offers were made in March. It took approximately two months after receiving an offer for individuals to consider their options, accept the offer, apply for and receive approval of parole, and arrive in the United States. The first two individuals arrived in Boston on May 4 and 8, 2023, with another two individuals/families arriving on June 1, 2023.

14. While we are still in the early months of developing and testing the Job Sponsorship Pathway with individuals eligible for Uniting for Ukraine, we intend to expand to other parole programs, including the parole programs for Cubans, Haitians, Nicaraguans, and Venezuelans (CHNV). Employers demonstrate a willingness to hire individuals who have the skills and talents that they cannot find domestically and there is no question that parole beneficiaries seek independence and self-sufficiency. As we learn more from our roll-out of the Job

Sponsorship Pathway with the Uniting for Ukraine program, we hope to eventually be able to build up the necessary infrastructure to provide the kind of support that enables success for the CHNV parole programs, too. We see tremendous benefit in speeding up the process of self-sufficiency by identifying individuals' skills and experience while they are still abroad, rather than waiting until they arrive to the United States to begin getting oriented to a new job and country. We also recognize that individuals seeking to come to the United States are willing to work and seek opportunities so they can provide for their families. Recognizing this need, Alight in partnership with others, aims to expand the Jobs Sponsorship Pathway to CHNV parolees, any additional, eligible parolees, and/or individuals with refugee status in the second half of 2023 and are in discussion with potential partners about the expansion.

15. The first individual to arrive through the Jobs Sponsorship Pathway is a 50-year-old woman who lived in the city of Sumy, Ukraine, when the war broke out last year. Sumy is in eastern Ukraine and is less than 20 miles from the Russian border. The city was one of the first to be occupied by Russian forces. The individual will work as an early childhood educator at Temple Beth Shalom's childcare center in Greater Boston. A Ukrainian woman, scheduled to arrive June 1, also to work at Temple Beth Shalom's childcare center, will arrive with her five- year daughter.

16. After years of listening to the voices of displaced people, particularly those resettled to the United States, Alight has learned that there need to be stronger

systems in place in help them navigate their new and complex realities. We know that employers have an interest in and recognize the benefits of refugee and displaced individuals' talent and are eager to hire parole beneficiaries to fill critical labor gaps. These individuals can survive and thrive in the United States and contribute back to their communities—they just have to be given the means to do so. All of Alight's work in building support systems for parole beneficiaries here in the United States is premised on the demonstrated truth that providing support to displaced individuals yields dividends far beyond the initial investment necessary to welcome such individuals to their new community.

17. Alight believes that abundance is everywhere, and our work is focused on shining a light on each individual's dignity, humanity, and value. Alight stands by research and facts that immigrants, including displaced persons, refugees or migrants, are a net positive contributor to their new country and the economy. Immigrants are new neighbors that come with their own education, talent, and professional experience. They are not taking American jobs, but rather filling critical labor gaps in the U.S. economy and contributing to the economic, social, and cultural wealth of U.S. communities.

18. I declare under penalty of perjury and under the laws of the United States that the foregoing is true and correct.

Executed at Washington, D.C. on June 15, 2023

Jocelyn Wyatt

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ready**sign**

Jocelyn Wyatt, Declarant